

Exhibit 7

THE INGBER LAW FIRM

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February 14, 2018

VIA EMAIL

Attn: Sarah Levitan, Esq.
Reed Smith LLP
599 Lexington Avenue
New York, NY 10022

**Re: Industria de Alimentos Zenu S.A.S. v. Latinfood U.S. Corp., et al,
2:16-CV-06576-KM-MAH**

Dear Sarah:

Attached is the supplemental discovery production to date, resulting from Defendants' diligent efforts to reach out to vendors in order to recover emails and/or documentation which was lost due to an unforeseeable hard drive failure.

Below are Defendants' supplemental responses to Defendants' August 9, 2017 Discovery Responses to Plaintiff's Requests for Production of Documents ("Defendants' Responses").

The following supplemental documents are further responsive to Plaintiff's May 15, 2017 Requests for the Production of Documents ("Plaintiff's Requests"):

- **Request # 18: All communications with designers of the labels for Defendants' Products, including any materials or samples provided to those designers- See Attorneys' Eyes Only Bates Nos.: LATIN000202-LATIN000364.**
- **Request #19: All communications with the photographers capturing Defendants' Products, whether for labels or advertising, including any materials or samples provided to those photographers - See Attorneys' Eyes Only Bates Nos.: LATIN000365-LATIN000391.**
- **Request #24: All documents that suggest any instances or possible instances of confusion between Plaintiff's and Defendants' use of the Zenú name or mark, including but not limited to misdirected mail, telephone calls, orders, complaints and inquiries as to affiliation, sponsorship, or relation- See Attorneys' Eyes Only Bates No.: LATIN000201.**



Defendants' Crashed Hard Drive

See Attorneys' Eyes Only Bates Nos.: LATIN000195 – LATIN000200 demonstrating Defendants' good faith efforts to recover lost emails and/or documentation from its vendors resulting from the crashed hard drive.

The following are Defendants' amended responses to Defendants' August 9, 2017 Discovery Responses to Plaintiff's Interrogatories Directed to Defendant Wilson Zuluaga and Defendant Latinfood U.S. Corp. d/b/a Zenú Products Co. ("Defendants' Interrogatory Responses"):

- **Interrogatory # 6 (directed to Defendant Wilson Zuluaga): Identify how Mr. Zuluaga became aware of Plaintiff's ZENÚ mark, including the timeframe in which he became aware-** Defendant became aware of Plaintiff's alleged ZENÚ mark in the United States upon receiving a January 24, 2013 email from "J. Briggs" at USTM (see Bates No. USTM0000002).
- **Interrogatory # 7 (directed to Defendant Wilson Zuluaga): Identify how Mr. Zuluaga became aware of Plaintiff's RANCHERA mark, including the timeframe in which he became aware-** Defendant became aware of Plaintiff's alleged RANCHERA mark in the United States upon receiving a January 24, 2013 email from "J. Briggs" at USTM (see Bates No. USTM0000002).
- **Interrogatory # 19 (directed to Defendant Latinfood U.S. Corp.): Describe when and how Defendants' first became aware of Plaintiff's use of the ZENÚ mark-** Defendant became aware of Plaintiff's alleged ZENÚ mark in the United States upon receiving a January 24, 2013 email from "J. Briggs" at USTM (see Bates No. USTM0000002).
- **Interrogatory # 20 (directed to Defendant Latinfood U.S. Corp.): Describe when and how Defendants' first became aware of Plaintiff's use of the RANCHERA mark-** Defendant became aware of Plaintiff's alleged RANCHERA mark in the United States upon receiving a January 24, 2013 email from "J. Briggs" at USTM (see Bates No. USTM0000002).

Pursuant to the foregoing, we believe this letter obviates any and all of Plaintiff's possible spoliation claims. If there are any remaining objections, Plaintiff should inform us of such immediately and we will seek to attend to any outstanding objections accordingly.

Very truly yours,

THE INGBER LAW FIRM

By: 

Mark J. Ingber, Esq.

cc: Wilson Zuluaga, President of Latinfood U.S. Corp. d/b/a Zenú Products Co. (via email)